

**UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF GEORGIA
ATLANTA DIVISION**

TERI FIELDS, as Putative
Administratrix of the Estate of
JOEANN SNEAD, Deceased, and
Catolyn Merriweather, Individually, as
surviving child of JoeAnn Snead,
Deceased,

Plaintiff,

v.

ARBOR TERRACE AT CASCADE,
LLC; THE ARBOR BARRINGTON
COMPANY, LLC d/b/a THE ARBOR
COMPANY, THE ARBOR CP, LLC,
THE ARBOR HOLDING COMPANY,
LLC, ARBOR MANAGEMENT
SERVICES, LLC, JOHN DOE NO. 1
and AUDRIENNE STEVENS,

Defendants.

CIVIL ACTION FILE NO.:

1:20-CV-02346-TCB

JOINT MOTION FOR STAY OF DISCOVERY

COME NOW, Plaintiffs and Defendants (collectively "Parties") and jointly move this Court for a stay of discovery showing this Court as follows.

On August 31, 2020, Plaintiffs filed their Motion to Remand [Doc. 22]. Thereafter, on September 14, 2020, Defendants filed their Response in

Opposition to Plaintiffs' Motion to Remand. [Doc. 30]. On September 25, 2020, Defendants filed their Motion for Oral Argument in Opposition to Plaintiffs' Motion to Remand as Complete Preemption Applies to this Matter and Establishes Federal Subject Matter Jurisdiction. [Doc. 34]. Plaintiffs filed their Reply to Defendants' Response in Oppositions to Plaintiffs' Motion to Remand and Response in Opposition of Defendants' Motion for Oral Argument on September 28, 2020 [Doc. 36, 37].

Given the uncertainty surrounding whether this matter will remain before this Court the parties hereby respectfully request that discovery be stayed until this Court has ruled on the Plaintiffs' Motion to Remand.

Respectfully submitted this 6th day of October, 2020.

HALL BOOTH SMITH, P.C.

/s/ Harold W. Spence

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/s/ TERESA PIKE TOMLINSON

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*Signed with Express Permission by
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MANAGEMENT SERVICES, LLC,
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AUDRIENNE STEVENS,

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CERTIFICATE OF COMPLIANCE

The foregoing **Joint Motion for Stay of Discovery** is double spaced in 14-point Times New Roman font and complies with the type-volume limitation set forth in Local Rule 5.1(B)(3) and 7.1(D).

Respectfully submitted this 6th day of October, 2020.

HALL BOOTH SMITH, P.C.

/s/ TERESA PIKE TOMLINSON

JOHN E. HALL, JR.

Georgia Bar No. 319090

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CERTIFICATE OF SERVICE

I hereby certify that I have this day served a copy of the within and foregoing **Joint Motion for Stay of Discovery** with the Clerk of Court using the CM/ECF system, which will automatically send email notification of such filing to

the following parties of record below and by depositing a true copy of the same in the U.S. Mail, with adequate postage affixed thereon, addressed as follows:

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Respectfully submitted this 6th day of October, 2020.

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